

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Joseph G. DuMouchelle and Melinda
J. Adducci,

Debtors.

Chapter 7

Case No. 19-54531
Honorable Lisa Gretchko

Teodor Gelov,

Plaintiff,

v.

Melinda J. Adducci,

Defendant.

Adversary Pro. No. 20-04172

**STIPULATION FOR ENTRY OF AN ORDER
SETTING AMENDED SCHEDULE REGARDING
PRIVILEGE ISSUES PERTAINING TO DISCOVERY OF ESI**

Teodor Gelov (“Plaintiff”), and Melinda J. Adducci (“Defendant” and together with Plaintiff, the “Parties”), by their respective counsel, stipulate to entry of the form of the Order attached hereto as **Exhibit 1** and the Parties state that they will be ready for oral argument on or after March 3, 2025 regarding the issues outlined in their briefs at ECF No. 261 and 262 respectively.

WHEREFORE, the Parties pray for entry of the attached order or other such similar relief.

Respectfully submitted,

**TAFT STETTINIUS &
HOLLISTER, LLP**

By: /s/Kimberly Ross Clayson

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Counsel to Plaintiff, Teodor Gelov

Dated: February 7, 2025

JOHN R. FOLEY, P.C.

By: /s/Patrick A. Foley (w/permission)

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*Counsel for Defendant Melinda J.
Adducci*

Dated: February 7, 2025

EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Joseph G. DuMouchelle and Melinda
J. Adducci,

Debtors.

Chapter 7

Case No. 19-54531
Honorable Lisa Gretchko

Teodor Gelov,

Plaintiff,

v.

Melinda J. Adducci,

Defendant.

Adversary Pro. No. 20-04172

**STIPULATED ORDER
SETTING AMENDED SCHEDULE REGARDING
PRIVILEGE ISSUES PERTAINING TO DISCOVERY OF ESI**

THIS MATTER is before the Court on the *Stipulation For Entry Of An Order
Setting Amended Schedule Regarding Privilege Issues Pertaining to Discovery of
ESI* (the “Stipulation”) [ECF No. ____], between Plaintiff,¹ and Defendant,

WHEREAS, the Court heard from the Parties at a status hearing on February

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion to Compel at ECF No. 188 and Plaintiff’s Response Brief at ECF No. 220.

3, 2025 (the “Status Hearing”), at which time counsel for Plaintiff and Defendant both appeared, and placed this agreement on the record as a form and plan for resolving ongoing discovery disputes and for the reasons set forth by the Parties in the Stipulation;

NOW THEREFORE, IT IS HEREBY ORDERED,

The Parties shall file with the Court a joint statement (the “Executive Summary”) summarizing the remaining issues of privilege and the number of ESI Files in dispute for Defendant’s production by February 7, 2025; and

The Parties’ deadline to file their reply briefs described in the Court’s order at ECF No. 255 (“ESI Dispute Scheduling Order”) is extended from February 7, 2025 to February 14, 2025,

The Court’s in-person hearing for oral arguments described in the ESI Dispute Scheduling Order is adjourned from February 24, 2025 to _____, 2025 at __:__a/p.m., Courtroom 1975, 211 West Fort Street, Detroit, Michigan, 48226.

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

Joseph G. DuMouchelle and
Melinda J. Adducci,

Debtors.

Chapter 7

Case No. 19-54531-lsg

Hon. Lisa S. Gretchko

Thomas T. Ritter,

Plaintiff,

v.

Melinda J. Adducci,

Defendant.

Adversary Pro. No. 20-04381

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2025, I caused to be served a copy of the *Stipulation For Entry Of An Order Setting Amended Schedule Regarding Privilege Issues Pertaining to Discovery of ESI* and this *Certificate of Service* by using the Court electronic filing system which will send notification of such filing to all parties listed on the ECF list in the above-captioned case.

**TAFT STETTINIUS &
HOLLISTER, LLP**

By: /s/ Kimberly Ross Clayson

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R. Christopher Cataldo (P39353)

Kimberly Ross Clayson (P69804)

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ccataldo@taftlaw.com

Dated: February 7, 2025

Counsel to Plaintiff, Teodor Gelov